

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Alfred Omar BULLARD

Case: 2:22-mj-30444  
Case No. Assigned To : Unassigned  
Assign. Date : 10/13/2022  
USA V. BULLARD (CMP)(CMC)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 11, 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 922(g)(5)(A)	Illegal Alien in Possession of Firearm and Ammunition
Title 18, United States Code, Section 922(g)(3)	Unlawful User/Addict of Controlled Substance in Possession of Firearm

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Complainant's signature

ICE/FBI Task Force Officer Jeremy McCullough  
Printed name and title



Judge's signature

Kimberly Altman, United States Magistrate Judge  
Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: October 13, 2022

City and state: Detroit, MI

## AFFIDAVIT

I, Jeremy McCullough, being duly sworn, depose and state the following:

1. I am a Deportation Officer with United States Department of Homeland Security, Immigration and Customs Enforcement, Enforcement and Removal Operations, having been so employed since March 2003. Previously I was employed by the United States Department of Justice, Immigration and Naturalization Service, Detention and Removal Operations. I am currently assigned to the Federal Bureau of Investigation (FBI) Violent Gang Task Force (VGTF) and have been so for the previous 9 years. During my career, I have been involved in numerous investigations of federal firearms, narcotics, fraud, homicide and public corruption investigations.
2. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports regarding the events and circumstances and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.
3. I am currently involved in an investigation of Alfred Omar BULLARD, born XX/XX/1982. BULLARD is a citizen and national of the Bahamas and claimed he was residing at XX East Grixdale, Detroit, Michigan. This investigation concerns BULLARD and violations of Federal firearms laws.
4. On June 19, 2019, BULLARD was lawfully admitted to the United States on a temporary basis to be lawfully present in the United States until December 18, 2019. After December 18, 2019, when BULLARD did not depart from the United States, he became an unlawfully present alien in violation of the Immigration and Nationality Act. BULLARD was initially admitted to the United States as a visitor.
5. On October 11, 2022, at approximately 1:00 PM., Detroit Police Officers Bilal #4670 and Sinawi #4584 were dispatched to area of Grixdale

and John R in the City of Detroit. Upon arrival officers determined that the callers were DEA agents and Task Force Officers conducting surveillance in the area. Surveillance crew observed the suspect BULLARD with a firearm in his hand with his arm extended towards the sky. BULLARD fired the weapon twice.

6. BULLARD was taken into police custody at the scene and was transported to the Detroit Detention Center.

7. TFO's McCullough (ERO) and White (BP) conducted an interview of BULLARD at the Detroit Detention Center. Prior to the interview BULLARD was read his Advice of Rights. BULLARD stated that he illegally purchased the firearm from an unknown subject walking down the street. BULLARD admitted the firearm was not purchased legally. BULLARD was asked if he purchased ammunition for the firearm, to which he stated that he purchased ammunition from another unknown subject on the street. BULLARD admitted that he fired the firearm on October 11, 2022, after he was directed to do so by one of the residents at XX East Grixdale, Detroit because a dark colored minivan was parked near the address. The occupant of the dark colored minivan was a law enforcement officer conducting surveillance with the DEA. BULLARD also admitted to firing the gun into the air other times when he saw vehicles in the area he did not recognize. BULLARD also questioned about his marijuana use and stated that he smokes marijuana daily. Bullard was in possession of suspected marijuana at the time of his arrest. The suspected marijuana was placed into Detroit Police evidence, along with the firearm.

8. On October 11, 2022, affiant spoke with Special Agent Michael Jacobs of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) to request an interstate nexus determination on the Smith and Wesson, .38 caliber, serial number #AFV9576. Special Agent Jacobs advised that the Smith and Wesson, .38 caliber is a firearm that is manufactured outside the state of Michigan and therefore traveled in interstate commerce prior to its recovery in the County of Wayne, Eastern Judicial District of Michigan on October 11, 2022.

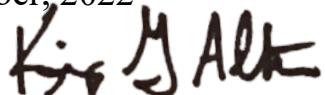
9. Based on the above facts, I have probable cause to believe Alfred Omar BULLARD, an alien who is illegally or unlawfully in the United States, on October 11, 2022, in the Eastern District of Michigan, did knowingly and intentionally possess a firearm and ammunition, to wit: a

Smith and Wesson, .38 caliber, serial number #AFV9576 and (3) live .38 caliber rounds of ammunition, which had been shipped or transported in interstate or foreign commerce, in violation of Title 18 United States Code, Section 922(g) (5) (A) – and was, in violation of Title 18 United States Code, Section 922(g) (3) - an unlawful user of/or addicted to any controlled substance in possession of a firearm.



Task Force Officer Jeremy McCullough  
Federal Bureau of Investigation/ Immigration and  
Customs Enforcement

Sworn to before me and subscribed  
in my presence, this \_\_\_\_<sup>th</sup> day of  
October, 2022



Kimberly Altman  
United States Magistrate Judge

Dated: October 13, 2022